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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

RIA R SQUARED, INC.,)	
a Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 21-CV-125-S
)	
PAUL D. MCCOWN,)	
MCCOWN ENTERPRISES, LLC,)	
)	
)	
Defendants.)	

AFFIDAVIT OF CHRISTOPHER VONHOLTUM

STATE OF WYOMING)
) ss
COUNTY OF FREMONT)

I, Christopher VonHoltum, hereby attest under oath and penalty of perjury that the following facts are true and correct to the best of my knowledge:

1. I am over the age of 21 years old, and I have personal knowledge of the facts set forth herein. I would and could testify to the facts if called upon to do so in a court of law.
2. I am the President of Central Bank & Trust ("CB&T").
3. On July 30th, 2021 CB&T was served with a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (the "Subpoena").

4. The Subpoena sought production of fourteen (14) separate categories of documents from CB&T related to accounts held by Wyoming Catholic College (the "College") and Susan Gleason ("Ms. Gleason").

5. In order for CB&T to comply with the Subpoena, it would require 5 CB&T employees to review approximately 700 pages of documents related to the College and Ms. Gleason.

6. I estimate that this review would take 40 hours and cost CB&T \$4000.00.

DATED: August 10, 2021



Christopher VonHoltum
President – Central Bank & Trust

Subscribed and sworn to before me this 10 day of August, 2021, by Christopher VonHoltum, as President of Central Bank & Trust.

Witness my hand and official seal.

My commission expires: 12.01.23


Notary Public